

EXHIBIT 2

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JAMES CONTANT, *et al.*,

Plaintiffs,

v.

BANK OF AMERICA CORPORATION, *et al.*,

Defendants.

No. 17-cv-3139-LGS

DECLARATION OF WILLIAM F. HENNESSEY, 2ND IN SUPPORT OF FOREIGN DEFENDANTS' MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION

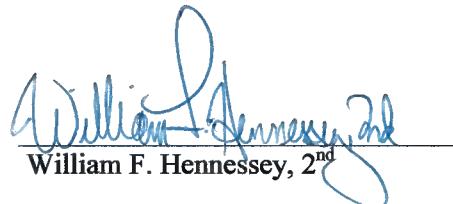
I, William F. Hennessey, 2nd, declare under penalty of perjury as follows:

1. I am a Director in the Group Legal, Group Dispute Resolution – Litigation & Legal Investigations group for BNP Paribas in New York.
2. I submit this declaration in support of the Foreign Defendants' Motion to Dismiss for Lack of Personal Jurisdiction in the above-captioned action. The facts stated herein are true and correct, to the best of my knowledge, based on records maintained by BNP Paribas and its subsidiaries in the ordinary course of business.
3. BNP Paribas, identified in the Second Amended Complaint as "BNP Paribas Group," is a financial institution organized under the laws of France. BNP Paribas is, and at all times relevant to this litigation was, a limited liability company (société anonyme) incorporated in France. BNP Paribas is registered in the French Commercial Register (Registre du commerce et des sociétés) under no. 662 042 449 R.C.S. Paris.
4. BNPP's registered office and headquarters are located at 16 boulevard des Italiens, Paris, 75009 France.

5. BNPP is a French bank that has four retail banking markets in Europe, namely in France, Belgium, Italy and Luxembourg. BNP Paribas, including its own subsidiaries and branches, has over 198,000 employees in 73 countries. Roughly 16,600 of those employees are employed in the United States.
6. BNP Paribas maintains four licensed branches in the United States, two in New York, New York, and one each in Chicago, Illinois and San Francisco, California, as well as representative offices in Dallas, Texas, and Los Angeles, California. BNP Paribas's United States foreign exchange business is centralized in and traded out of New York. BNP Paribas also has direct and indirect subsidiaries in the United States.
7. In 2017, the most recent full year for which audited financial statements are available, a majority of BNP Paribas' total revenue (including revenue for all direct and indirect subsidiaries) was attributable to regions outside the United States. BNP Paribas reported total revenue of roughly 43 billion Euros in 2017, of which only 5 billion was attributable to North America.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, to the best of my knowledge, information and belief, based on records maintained by BNP Paribas in the ordinary course of business.

Executed in New York, NY on December 20, 2018



William F. Hennessey, 2nd